

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
NEWPORT NEWS DIVISION**

**FRANCIS W. HOOKER, JR.,
for himself and on behalf of all
similarly situated individuals,**

Plaintiff,

Case No.: 4:13-cv-00003 (AWA/LRL)

v.

SIRIUS XM RADIO INC.

Defendant.

**PLAINTIFFS' MOTION FOR FINAL APPROVAL AND
ATTORNEYS' FEES**

Class Representatives Francis W. Hooker, Jr., Eric Knutson, Yefim Elikman, and Anthony Parker will and hereby do move this Honorable Court on December 20, 2016 pursuant to Fed. R. Civ. P. 23(e) for an order (1) granting final approval of the class action settlement and certification of the settlement class; and (2) awarding attorney's fees, litigation expenses, and service awards to the Class Representatives.

This Motion is based upon: (a) the accompanying Memorandum of Points and Authorities; (b) the Declaration of Michael A. Caddell with its exhibits; (c) the Declaration of Christopher Colt North; (d) the Declaration of William Downing; (e) the Declaration of Abbas Kazerounian; (f) the Declaration of Joshua B. Swigart; the (g) Declaration of Jason A. Ibey; (h) the Declaration of Myles McGuire; (i) the Declaration of Clifford Cantor; (j) the Declaration of Michael J. McMorrow; (k) the Declaration of David P. Healy; (l) the Declaration of Francis W. Hooker, Jr.; (m) the Declaration of Erik Knutson; (n) the Declaration of Yefim Elikman; (o) the Declaration of Anthony Parker; (p) the Declaration of Geoffrey P. Miller; (q) the Declaration of Jeffrey A. Hansen; (r) the

Proposed Final Approval Order, filed concurrently herewith; (s) the response in opposition to objections to the proposed settlement; (t) the records, pleadings, and papers filed in this action; and (u) such other documentary and oral evidence or argument as may be presented to the Court at the hearing of this Motion.

Defendant Sirius XM Radio Inc. does not oppose this Motion.

Date: November 21, 2016

Respectfully submitted,

/s/ Christopher C. North

Christopher Colt North (VSB # 16995)

cnorthlaw@aol.com

William L. Downing (VSB # 17704)

wdowninglaw@aol.com

THE CONSUMER & EMPLOYEE RIGHTS
LAW FIRM, P.C.

751-A Thimble Shoals Blvd.

Newport News, VA 23606

Tel: (757) 873-1010

Fax: (757) 873-8375

Michael A. Caddell

Michael A. Caddell (*pro hac vice*)

mac@caddellchapman.com

Cynthia B. Chapman (*pro hac vice*)

cbc@caddellchapman.com

CADDELL & CHAPMAN

628 East 9th Street

Houston, TX 77007-1722

Telephone: (713) 751-0400

Fax: (713) 751-0906

Abbas Kazerounian (*pro hac vice*)

ak@kazlg.com

KAZEROUNI LAW GROUP, APC

245 Fischer Avenue, Suite D1

Costa Mesa, CA 92606

Tel.: (800) 400-6808

Fax: (800) 520-5523

Email:

Attorneys for Plaintiff

CERTIFICATE OF SERVICE

I hereby certify that on November 21, 2016, I filed a true and correct copy of the foregoing document using the Court's CM/ECF system. The system will then send an electronic notice of filing to the following counsel of record:

William V. O'Reilly (VSB # 26249)
Attorneys for Defendant Sirius XM Radio Inc.
Jones Day
51 Louisiana Avenue, N.W.
Washington, DC 20001
Tel: (202) 879-3939
Fax: (202) 626-1700
Email: woreilly@jonesday.com

Thomas Demitrack (admitted *pro hac vice*)
Attorney for Defendant Sirius XM Radio Inc.
Jones Day
North Point
901 Lakeside Avenue
Cleveland, OH 44114-1190
Tel: (216) 586-3939
Fax: (216) 579-0212
Email: tdemitrack@jonesday.com

Lee A. Armstrong
Attorney for Defendant Sirius XM Radio Inc.
Jones Day
250 Vesey Street
New York, NY 10281
Tel.: (212) 326-8340
Email: laarmstrong@JonesDay.com

/s/ Christopher Colt North

Christopher Colt North (VSB # 16995)